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April 11, 2025

Via E-Filing

The Honorable Melissa R. DuBose
District Judge for the U.S. District Court for the District of Rhode Island
By Designation for the U.S. District Court for the District of Maine

Re: *Laurel D. Libby, et al. v. Ryan M. Fecteau et al.*, No. 1:25-cv-00083-MRD (D. Me.)

To the Honorable Judge DuBose:

On March 11, 2025, Plaintiffs filed the above action and sought a preliminary injunction, which they argued on April 4, 2025. Maine House District 90 remains without a voice or a vote after Defendants stripped Representative Laurel Libby's ability to speak and cast floor votes. Detailed in Plaintiffs' preliminary injunction briefing, the refusal to count House District 90's votes indefinitely is unprecedented; not even the U.S. House of Representatives considers itself to have such power. *See* Pls. Mot. For Preliminary Injunction 7-8, ECF 8; *see also* Pls. Reply 6-7 & n.5, ECF 34. Also unprecedented is Defendants' attempt to evade judicial review of these extraordinary acts. Legislative immunity is not a sword to be used to silence legislative debate and disenfranchise thousands living in House District 90; it is a shield to protect full and frank legislative debate, all for the benefit of the people for whom legislators serve. Pls. Reply 1-5.

The irreparable harm to Plaintiffs is ongoing as the legislative session continues. Among other votes taken on the House floor last week, the House rejected legislation about unauthorized paramilitary training by a margin of only 74-72. Representative Libby had no "yea" or "no" vote; her district was simply marked as a "Z." *See* Roll Call No. 75 for LD 303 (April 8, 2025), <https://perma.cc/4EDE-4EVT>.

Plaintiffs respectfully request an order from this Court, if possible, before the next House floor session to be held on Tuesday, April 15, 2025. Between then and the end of the legislative session, at least 1,800 more bills are likely to come to the House floor. Every legislator will have a vote—except Representative Libby. Defendants have had every opportunity to right that wrong. But they remain steadfast in denying the 9,000 constituents in District 90 their vote absent judicial intervention.

Sincerely,

/s/ Patrick N. Strawbridge
Patrick N. Strawbridge

Counsel for Plaintiffs